

# EXHIBIT 31

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US DISTRICT COURT  
SAN JUAN, PR  
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## RESPONSE TO OMNIBUS OBJECTION

### I. CONTACT INFORMATION

Name: Yazmín Martínez Cole

Mailing Address: #30 C/ Juan C. Borbón Apt. 311

Guaynabo P.R. 00969-5320

Contact Phone Home: \_\_\_\_\_ Cell (787) 390-1439

Claim #: 177243

### II. Caption

#### A. Clerk's Office

United States District Court  
Room 150 Federal Building  
San Juan Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al. (Debtors)

C. Case Number: 17 BK 3283 – LTS

D. Omnibus Objection regarding amounts not paid by the Commonwealth of Puerto Rico:

Evidence by proof of claim numbers:

#49762 – Act 89 – *Romerazo* – Effective July 1, 1995

*Act 89 – Uniform Compensation – Effective 1979*

#94057 – June 6, 2008 Pay Scale Act – Step Increases

#96621 – Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

*Act 164 (2004) of Ms. Sila Calderón – effective January 2004*

III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 “Romerazo” – Effective July 1, 1995

*Act 89 – Uniform Compensation – Effective 1979*

June 6, 2008 Pay Scale Act – Step Increases

Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila M. Calderón, effective January 2004

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IV. Supporting Documentation

YMC Enclosed are documents evidencing the years of service with the Puerto Rico Telephone Company, S.J., Puerto Rico, from the 16th of May of 1988 through the 14th of January of 2002. I ended my career as a Wireless Service Sales Consultant II with Puerto Rico Telephone Company, S.J., Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of educational service.

YMC Enclosed are documents in support of this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

Yazmín Martínez Cole

Printed name

[signature] 01/17/22

Signature

P.S.

*In 1988 I became a regular employee of the Communications Corporation of P.R. (CCPR). This agency belonged to the Commonwealth of P.R. (i.e., the government) and was merged in 1994 with the Puerto Rico Telephone Company (PRTC), also an agency that belonged to the Commonwealth of P.R. It was not until 1999 that the governor in office at the time, Dr. Pedro Roselló, sold it and it became private.*

*The basis of my claim is that under the laws mentioned above on the first page of this document, I am owed money according to the dates when these were created and while I worked for the (CCPR) and (PRTC), as mentioned here.*

*This is money owed based on wage increases. For this reason, I do not agree with my petition being dismissed.*

*I thank you for your consideration of this matter.*

*Sincerely,*

[signature]

Case:17-03283-LTS Doc#:19886-1 Filed:01/21/22 Entered:01/25/22 14:57:45 Desc:  
Exhibit Page 1 of 1



PRT/CLARO  
P.O. Box 360998  
San Juan PR 00936-0998

## CERTIFICATION

**YAZMIN MARTINEZ COLE**  
**XXX-XX-4018**

For the former employee referenced above, we certify the following:

- She joined CCPR effective 05/16/1988.
- She joined PRT/Claro effective 05/05/1994.
- She worked as a regular employee through 01/14/2002.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Wednesday, October 7, 2020.

[signature]

Abigail Alejandro González  
Abigail Alejandro González  
Compensation Officer  
Compensation and Records

Yazmin Martinez Cale  
#30 c/Juan C. Borbix Apt. 311  
Guaynabo PR 00969-5320

U.S. DISTRICT COURT  
SAN JUAN, PR

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Clerk's Office  
United States District Court  
Room 150 Federal Building  
San Juan, Puerto Rico 00918-1767



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### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 177243 DN 19886**

Signed this 5<sup>th</sup> of June 2022



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor". A blue line extends from the left side of the signature towards the left edge of the page.

Andreea I. Boscor

